

RECEIVED AUG 30 1988

CLEAN WATER, INCORPORATED

125

204 HORNER STREET
TOMS RIVER, N J 08753

MARINE CONSULTANTS

201 341-3600
24 HOURS

TWENTY-FOUR
AUGUST
1988

Mr. Paul Marchessault HSN CAN5
United States Environmental
Protection Agency
JFK Federal Building
Boston, Mass. 02203

Superfund Records Center
SITE: Coakley
BREAK: 11.9
OTHER: ---

Re: Letter sent by United States Environmental Protection Agency, Region 1, with reference to the Coakley Landfill site in North Hampton, New Hampshire, which we received on Monday, August 1, 1988.

Dear Mr. Marchessault:

Attached is my reply to the U.S. Environmental Protection Agency, Region 1, letter with reference to the Coakley Landfill Site in North Hampton, New Hampshire, which we received on Monday August 1, 1988.

Please be advised that effective May 1980 I, as President of Clean Water, Inc., only act as a consultant to the shipping companies, oil companies and major insurance companies, pertaining to ship salvage emergency pumping and oil pollution control operations.

Clean Water, Inc. also supplies sorbent materials, for absorbing oils, to the industry.

At present I am President of the Maritime Association of the Port of NY/NJ which is in its 115th year as a non-for-profit trade organization, and all of the officers and directors are non-salaried (see letterhead attached).

I am also a director of the Restoration Coordinating Committee for the restoration of the Statue of Liberty/Ellis Island, and I am one of seven that also are non-salaried and we had to approve of the various contractors' and the prices they charged for all work that was done for the restoration of the Statue of Liberty and is currently being done for the restoration of the Great Hall on Ellis Island. (see attached).

I was asked by the U.S. Navy to form a group for the support of the Navy home port in Staten Island, New York and as a result I was Chairman of the Steering Committee



Mr. Paul Marchessault HSN CAN5
U.S. E.P.A.
Boston, Mass. 02203

CLEAN WATER INCORPORATED
MARINE CONSULTANTS
204 HORNER STREET
TOMS RIVER NEW JERSEY 08753

Page two

and was a director of Fleet Week 1988 (part of the U.S. fleet arrived in New York Harbor from April 20 through April 25, 1988). I am a director for Fleet Week 1989 which will be held on or about April 30, 1989.

Also attached are other letters pertaining to cases where I represented the U. S. Government, in addition to hearings in Washington pertaining to pollution legislation and appropriations for the United States Coast Guard and the Federal Environmental Protection Agency.

I am 68 years old and I maintain my Clean Water, Inc. office to help pay my expenses at this time for three non-for-profit organizations that I devote my time to at no charge, as well as keeping in force my medical and major medical policies as I have had voluminous medical bills for my late daughter and my wife who is presently under doctor's care.

Very truly yours,

CLEAN WATER, INC.



Paul Preus, President

PP/ac
enclosures

Certified Mail #P 737 870 469

cc: Mr. Daniel Coughlin

CLEAN WATER, INCORPORATED

204 HORNER STREET
TOMS RIVER, N.J. 08753

MARINE CONSULTANTS

201 341-3600
24 HOURS

SIXTEEN
AUGUST
1988

Mr. Paul Marchessault HSN CAN5
United States Environmental
Protection Agency
JFK Federal Building
Boston, Mass. 02203

Re: Letter sent by United States Environmental Protection
Agency, Region 1, with reference to the Coakley
Landfill site in North Hampton, New Hampshire, which
we received on Monday, August 1, 1988.

Dear Mr. Marchessault:

Please be advised that the M/T ARO had a #6 oil spill whilst she was moored
at the Sprague Terminal, Newington, New Hampshire, June and/or July 1973.

Clean Water, Inc. does not have a job folder on this case as this case is
15 years old, and the following is a recollection of Clean Water, Inc. President,
Paul Preus:

During the 1970's whenever there was an oil spill from a tanker, barge etc.,
the United States Coast Guard had investigators or coordinators on scene, as did
the Federal Environmental Protection Agency, and the state had its representative
on scene. At all times these officials were the ones that designated where the
absorbed oil and oil soaked debris would be disposed of.

Clean Water, Inc. only worked on oil spills predominantly from tankers,
barges, tugs, or mystery spills when we were hired under the 311-K Fund by the
U.S. Coast Guard.

When Clean Water, Inc. was involved in oil pollution control operations, please
be advised that Clean Water, Inc. only disposed of absorbed oils, such as #2,3,4,5,6,
bunker C and crude oil at a landfill and/or disposal area as directed by either the
U.S. Coast Guard or the Federal Environmental Protection Agency. As defined under
CERCLA reference Hazardous Substances, #2,3,4,5,6, bunker C and crude oil, reference
Section 101 (14) 42 U.S. Code, Section 9601 (14) U.S. Code, and Section 101 (14) U.S.
Code, petroleum products do not fit the definition of hazardous materials.



CLEAN WATER INCORPORATED

MARINE CONSULTANTS

204 HORNER STREET

TOMS RIVER NEW JERSEY 08753

Mr. Paul Marchessault HSN CAN5
U.S. E.P.A.
Boston, Mass.

Page two

LaMorte Burns, Co., Inc. at that time had their office at One World Trade Center, New York City and was the P&I Club's underwriter's representative. Robert Lagotolla handled the case and a company called Coastal Services, Inc., from Braintree, Mass., was the pollution cleanup contractor initially. Coastal Services, Inc., for one reason or another, was relieved by Clean Water, Inc., per the instructions of Captain Norman DeWeir, Executive Vice-President of LaMorte Burns, Inc., thus, Clean Water, Inc. brought its personnel from New Jersey to the site of the oil spill and a Captain Clifford Moreland, who at that time resided in Vermont, was the P&I Club's on scene representative to see to it that the oil spill from the M/T ARO was cleaned up effectively and efficiently.

Clean Water, Inc. had two of its supervisors on scene; Robert Boulton, who we believe still resides near Clayton, New York, and Kevin O'Riordan, who resides in the vicinity of Houston, Texas, and CWI Superintendent, John Gallagher of New Orleans, LA

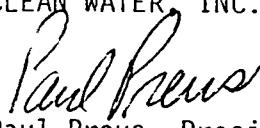
The United States Environmental Protection Agency had a representative on scene as did the State of New Hampshire Department of Environmental Protection and/or Services, as well as the United States Coast Guard.

Clean Water, Inc.'s President, Paul Preus, was on scene one day for a meeting and it was agreed with the above named officials that the oil soaked debris and grass that was cleaned from the waters of the State of New Hampshire was to be brought to the town of Newington, New Hampshire, Department of Sanitation facility, which was very near the Sprague Terminal Pier where the M/T ARO was moored. A great amount of the material was burned at the Newington Dept. of Sanitation facility with the approval of the representatives of the Federal E.P.A., U.S. Coast Guard, and the State of New Hampshire. It is very possible that the Newington Sanitation Facility collected garbage etc. with small trucks and then reloaded these trucks with 30 cu. yd. dump trucks and these very large trucks then could have deposited garbage and oil soaked debris at Coakley Landfill in North Hampton, New Hampshire. To the best of Clean Water, Inc.'s knowledge none of our trucks went to a landfill, as we were instructed to deposit it at the Newington Sanitation Department's facility which was very near the Sprague Terminal. John Gallagher, CWI Supt. was also at meeting.

In view of the above, we respectfully request that you delete Clean Water, Inc. from any United States E.P.A. action with reference to the Coakley Landfill case.

Very truly yours,

CLEAN WATER, INC.


Paul Preus, President

PP/ac

cc: Mr. Daniel Coughlin, Supv.



UNITED STATES DEPARTMENT OF JUSTICE

WASHINGTON, D.C. 20530

January 25, 1979

Address Reply to the
Division Indicated
and Refer to Initials and Number

FMR:rwb
154-446-75

Captain Paul Preus
President
Cleanwater, Inc.
204 Horner Street
Toms River, New Jersey 08753

Re: Philadelphia Suburban Corp. v. United
States, Court of Claims No. 446-75

Dear Captain Preus:

I wish to take this opportunity to express my sincere appreciation for your cooperation in connection with the Government's defense of the above-captioned case. Your testimony at trial was a splendid and lucid recitation of the relevant events of the "Corinthos" disaster. Moreover, your expert opinion in the area of oil pollution cleanup was inciteful and ably presented to the Court. I am compelled to remark that the Trial Judge appeared to be both fascinated with your detailed knowledge of the subject matter and manifested a keen interest in every word you offered.

It is encouraging to know that there still exists citizens such as yourself who are so motivated to come forward and aid in righting an obvious wrong.

In closing, I want you to know that I found it personally rewarding to work with you and I believe your testimony was crucial to supporting the Government's position. I applaud your unselfish efforts.

Sincerely,

Frank M. Rapoport

FRANK M. RAPOPORT
Trial Attorney, Civil Division
Commercial Litigation Branch



United States Department of Justice

UNITED STATES ATTORNEY
WESTERN DISTRICT OF PENNSYLVANIA
633 U. S. POST OFFICE & COURTHOUSE
PITTSBURGH, PENNSYLVANIA 15210

PLEASE REFER TO
INITIALS AND NUMBER

FTS 722-3500
COMM 412-644-3800

July 18, 1979

Paul Preus
Clean Water, Incorporated
P.O. Box 1002
Toms River, New Jersey 08753

Re: United States of America v.
Malitovsky Cooperage Company,
Defendant v. City of Pittsburgh,
and Allegheny County Sanitary
Authority, Third-Party Defendants
Civil Action No. 75-748

Dear Paul:

Enclosed herewith is a copy of the Court Opinion rendered in the above captioned case. As you can see, District Court Judge Gustave Diamond ruled wholly in favor of the government and awarded a judgment in the sum of \$68,176.79.

I wish to take this opportunity to personally thank you for your invaluable assistance in rendering aid to the government in this case. I extend my best wishes in all future endeavors.

Very truly yours,

ROBERT J. CINDRICH
United States Attorney

Craig R. McKay
By: CRAIG R. MCKAY
Assistant U. S. Attorney

Enclosure

EDWARD W. BROOKE
MASSACHUSETTS

United States Senate

WASHINGTON, D.C. 20510

August 28, 1978

COMMITTEE
APPROPRIATIONS
BANKING, HOUSING, AND
URBAN AFFAIRS
SPECIAL COMMITTEE ON AGING

OFFICE
5203 J. F. K. FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02103
617-552-7143
437 OLD SENATE OFFICE BUILDING
WASHINGTON, D.C. 20510
202-516-2741

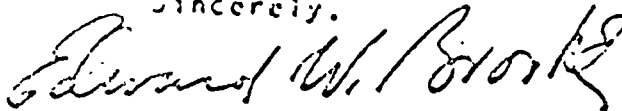
Captain Paul Preus
President
Clean Water, Inc.
P.O. Box 10002
Toms River, New Jersey 08753

Dear Captain Preus,

The U.S. Government Printing Office has at last distributed copies of the Senate Appropriations Committee hearings on the "Coast Guard's Resource Need for Responding to Oilspills." The testimony you provided was critical to the report and your expertise and insight were integral to the Committee's knowledgeable understanding of this highly complex issue.

I want to thank you for testifying before the Committee, and I expect that the dialogue we began at the Hearings will continue. I look forward to continuing to work with you.

Sincerely,



Edward W. Brooke

EWB/cnn

RECEIVED



UNITED STATES GENERAL ACCOUNTING OFFICE
WASHINGTON, D.C. 20548

COMMUNITY AND ECONOMIC
DEVELOPMENT DIVISION

MAY 16 1978

Mr. Paul Preus
21 Smith Road
Toms River, New Jersey 08753


Dear Mr. Preus:

I enjoyed meeting you on March 22, 1978, when we testified before Senator Brooke. As you may have heard there is a lot of interest in the report. I would like to thank you for your assistance in the review. The report (Coast Guard Response To Oil Spills--Trying To Do Too Much With Too Little) should be issued very shortly. When it is, a copy will be mailed to you.

The draft report was also used in hearings held in Annapolis, Maryland, on April 28, 1978, by Senator Mathias under the auspices of the Subcommittee.

Again, thank you for your assistance in developing the information needed by the Subcommittee.

Sincerely yours,


James M. Blume
Audit Manager

HAROLD T. (BIZZ) JOHNSON
1st DISTRICT, CALIFORNIA

COMMITTEE:
PUBLIC WORKS AND
TRANSPORTATION
CHAIRMAN

Congress of the United States
House of Representatives
Washington, D.C. 20515

OFFICE ADDRESS:
2347 HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515

DISTRICT OFFICE:
320 VERNON STREET
ROSEVILLE, CALIFORNIA 95678

July 28, 1978

Mr. Paul Preus
Clean Water, Incorporated
Post Office Box 1002
Court House Square
Toms River, New Jersey 08753

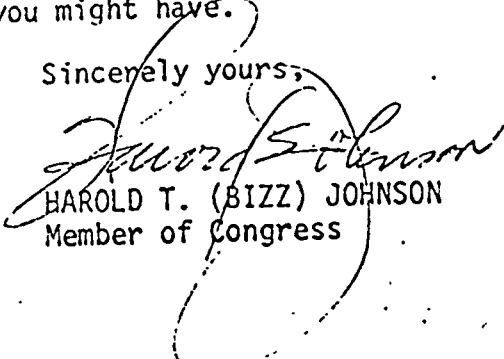
Dear Mr. Preus:

It was certainly a pleasure to have you with us at the Port Caucus meeting on July 13. Your insight into the problems we discussed in the field of regulation were most interesting and to the point.

Because of the lateness of the session, I doubt that either the Public Works or Merchant Marine Committees will have an opportunity to hold hearings on this problem this year. I do hope to focus attention on the problem next year early in the session.

I hope in the meantime you will continue to keep me advised of any suggestions or recommendations you might have.

Sincerely yours,


HAROLD T. (BIZZ) JOHNSON
Member of Congress

J:Nk

JOHN M. MURPHY, N.Y., CHAIRMAN

THOMAS L. ASHFLEY, OHIO
JOHN D. DINGELL, MICH.
WALTER B. JONES, N.C.
MARIO DIAGGI, N.Y.
GLENN M. ANDERSON, CALIF.
L. (KIKI) OK LA GARZA, TEX.
JOHN R. BRITAIN, LA.
GERRY E. STUBBS, MASS.
DAVID R. DOWEN, MISS.
CARROLL HUBBARD, JR., KY.
DON FONKER, WASH.
LES AU COIN, OREG.
NORMAN E. D'AMOURS, N.H.
JAMES L. ODGHASTAN, MINN.
WILLIAM J. HUGHES, N.J.
HARRISON A. MIFULSKI, MD.
DAVID F. DONIOR, MICH.
DANIEL K. AKAKA, HAWAII
MICHAEL OZTIG MYERS, PA.
JOE WYATT, TEX.
MIKE LOWMY, WASH.
PAUL HUTTO, FLA.
EDWARD J. STACK, FLA.
BRIAN DONNELLY, MASS.

PAUL M. MC CLOSKEY, JR., CALIF.
GENE SNYDER, KY.
EDWIN D. FORSYTHE, N.J.
DAVID C. TREEN, LA.
JOEL PRITCHARD, WASH.
DON YOUNG, ALASKA
ROBERT E. BAUMAN, MD.
NORMAN F. LEVY, N.Y.
DAVID F. EMERY, MAINE
ROBERT K. DORNAN, CALIF.
THOMAS D. EVANS, JR., DEL.
PAUL S. TRIBLE, JR., VA.
ROBERT W. DAVIS, MICH.
WILLIAM CARNEY, N.Y.
MELVIN H. EVANS, V.I.

U.S. House of Representatives
Committee on
Merchant Marine and Fisheries
Room 1334, Longworth House Office Building
Washington, D.C. 20515

CHIEF OF STAFF
CARL L. PERIAN
CHIEF COUNSEL
ERNEST J. CONRAD
CHIEF CLERK
FRANCES STILL
MINORITY COUNSEL
JACK E. SANDS

March 21, 1979

Captain Paul Preuss, Chairman
Harbor Environment Committee
The Maritime Association of
the Port of New York
80 Broad Street
New York, New York 10004

Dear Captain Preuss:

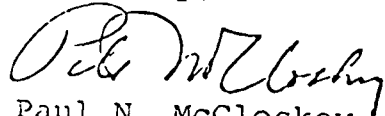
This is to solicit informal consideration and advice from you and your associates with respect to what Coast Guard regulatory or statutory reforms are needed to eliminate unnecessary and wasteful government involvement in your industry. This effort is believed consistent with general deregulation trends and with efforts to reduce the size and cost of government by returning matters to the private sector when doing so would be consistent with safety and the public interest.

The general area of potential interest concerns, but should by no means be limited to, licensing, manning, inspection and vessel preconstruction plan reviews. My preference is for a composite regulatory reform bill versus a piecemeal approach that would move or tackle each category separately, but I would like your advice on this point, too.

Should it be within the purview of your Association or Committee, another item of interest to me is the apparently loose arrangements that now exist between the Coast Guard and the American Bureau of Shipping and other classification societies. It might be feasible to extend and perfect such approval arrangements without the necessity of duplicating the certifying processes.

Could I have your advice on these issues at your earliest convenience? Please feel free to expand upon the tentative issues addressed here with the realization that this initiative is only in the explorative stage at this time.

Sincerely,

A handwritten signature in dark ink, appearing to read "Paul N. McCloskey, Jr.", written in a cursive style.

Paul N. McCloskey, Jr.
Member of Congress

PNMcC:jbb

[illegible][illegible]

U. S. House of Representatives
Committee on
Merchant Marine and Fisheries
Room 1004, Longworth House Office Building
Washington, D. C. 20515

CARL L. PERIAN
CHIEF COUNSEL
SERGEY J. CORRADO
CHIEF CLERK
FRANKIE BYLL
SECURITY COUNSEL
W. PATRICK MORRIS

March 30, 1977

WORKING LIST

SUBCOMMITTED ON COAST GUARD AND NAVIGATION

MARIO DIAGGI, CHAIRMAN:

WEDNESDAY, MARCH 30, 1977

Hearing on authorization for appropriations for the U.S.
Coast Guard for fiscal year 1976

1. Hon. Norman D. Dicks
Representative, 6th District, Washington
 2. VADM Paul E. Trimble
President, Lake Carriers Association
Cleveland, Ohio
- accompanied by
- Col. Leonard J. Goodsell
Executive Director, Great Lakes Commission
Ann Arbor, Michigan,
3. Captain Paul Preuss
President, Clean Water, Inc.
Toms River, New Jersey
 4. Hon. John F. Stenbak
Former Representative, 8th District, Minnesota
Washington, D.C.



AMERICAN BUREAU OF SHIPPING

65 BROADWAY

NEW YORK, N.Y. 10006

ROBERT T. YOUNG
CHAIRMAN OF THE BOARD

5 February 1979

Dear Paul,

Just a short note to express my thanks to you and the Robert L. Hague Post for the great honor that you have bestowed on the American Bureau of Shipping by presenting the Annual Trophy to our Company.

Needless to say, our visit to the White House last week was a thrilling event for both Virginia and myself and I think the planning and arrangements you made, which resulted in everything going so smoothly, deserves the highest praise.

Many thanks again and with kindest personal regards.

Sincerely,

Capt. Paul Preus
Robert L. Hague
Merchant Marine Industries
Post No. 1242
American Legion
32 Broadway
New York, New York 10004

Re: Request for Information Pursuant to Section 104
of CERCLA and Section 3007 of RCRA for the
Coakley Landfill Site in North Hampton, New
Hampshire.

CLEAN WATER INCORPORATED
MARINE CONSULTANTS
204 HORNER STREET
TOMS RIVER NEW JERSEY 08753

Reference Page 7, Attachment A, Page 5

GENERAL INFORMATION

1. Requests answered by: Paul Preus, President, Clean Water, Inc.
2. Clean Water, Inc. President, Paul Preus, from his recollection and telephone conversation with former Clean Water, Inc. Superintendent, John Gallagher (originally Paul Preus' patent attorney in Washington, D.C.). Mr. Gallagher is presently employed by Hudson Maritime Services, Hudson Square, 800 Cooper Street, Camden, NJ 08102 (Tel: 609-342-7500).
3. Clean Water, Inc. does not have a job folder on this case as it is 15 years old, and the information contained herein is a recollection of Clean Water, Inc.'s President, Paul Preus.
4. The on scene investigators from:
 - United States Coast Guard
 - Federal Environmental Protection Agency
 - State of New Hampshire Environmental Protection Services
5. To the best of our knowledge and recollection no Clean Water, Inc. vehicle disposed of any material at any time at the Coakley Landfill site. However, a lot of the oil adhered to the grass along the shoreline as well as oil soaked debris, and this was taken to the Newington Sanitation Department facility that was very near The Sprague Terminal. This was done with the approval of The United States Coast Guard, The Federal Environmental Protection Agency and the State of New Hampshire Environmental Protection Services.

Page two

5. cont'd

The on scene investigators from the U.S. Coast Guard, The Federal Environmental Protection Agency and the State of New Hampshire Environmental Protection Services gave permission for the Superintendent of the Sanitation Department of Newington, New Hampshire to burn the #6 oil soaked debris and grass at the Newington Sanitation Facility. Clean Water, Inc., in behalf of the M/T ARO owners and underwriters, paid the normal disposal fee to the Town of Newington for all material that was burned there, and they, in turn, burned it. When this permission was granted, the following personnel of Clean Water, Inc. were at the meeting, with the above officials:

CWI President, Paul Preus

CWI Superintendent, John J. Gallagher, Hudson Maritime Services,
Hudson Square, 800 Cooper Street, Camden,
New Jersey 08102 Tel: 609-342-7500

CWI Supervisor, Kevin O'Riordan (we believe Mr. O'Riordan resides
in the vicinity of Houston, Texas).

CWI Supervisor, Robert Boulton (we believe Mr. Boulton resides
near Clayton, New York).

Also present, representing the M/T ARO and its P&I Underwriters:

REDACTED - PERSONAL PRIVACY Captain Clifford Moreland

6. The on scene investigators from The United States Coast Guard, The Federal Environmental Protection Agency and The State of New Hampshire Environmental Protection Services.
7. No previous correspondence.

Page three

8. Clean Water, Inc.
204 Horner Street
Toms River, New Jersey 08753
Paul Preus, President
Mary Lou Preus, Secretary/Treasurer
9. Not applicable - Clean Water, Inc. is privately owned and is not part of or affiliated with any other corporation.

Reference Page 8, Attachment A, Page 6

10. State of Delaware, U. S. Corporation is Clean Water, Inc.'s agent, ^{Division of}Prentice Hall
Corporate Services, 1 Gulf & Western Plaza, New York City, N.Y. 10023.
11. Since 1980 Clean Water, Inc. has only acted as Maritime Consultants
and supplied to the industry sorbent materials for absorbing oils,
including on the surface of water.

As a consultant to the Maritime Industry as well as insurance companies
and private firms, with relation to ship salvage, emergency pumping,
and only oil petroleum pollution.

Prior to 1980 (November 1969 - May 5, 1980), Clean Water, Inc. provided
the necessary personnel, materials, and equipment to put into effect
oil pollution control operations and was employed predominantly by the
U.S. Coast Guard, major oil companies, and four of the major P&I
underwriters, and on a few occasions by the Federal Environmental Protection
Agency, although we were paid via the 311-K Fund which is managed by
the U. S. Coast Guard.

12. See attached; Enclosure A.

GENERATOR/TRANSPORTER INFORMATION

14. Unequivocally No

Reference Page 9, Attachment A, Page 7

15. Unequivocally No